

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)
) CASE NO. 17 B 08355
Catherine Harris,) HON. A. Benjamin Goldgar
) CHAPTER 13
DEBTOR.)

NOTICE OF MOTION

TO: Marilyn O Marshall, 224 South Michigan Ste 800, Chicago, IL 60604, via electronic court notification;

See attached service list.

Please take notice that on September 18, 2018, at 9:30 a.m. I shall appear before the Honorable A. Benjamin Goldgar in Courtroom 642 of the United States Bankruptcy Court, Everett McKinley Dirksen Building, 219 S. Dearborn Street, Chicago, Illinois 60604 and present the attached motion and you may appear if you so choose.

PROOF OF SERVICE

The undersigned, an attorney, certifies that she transmitted a copy of this notice and the attached motion to the attached service list via regular U.S. Mail with postage prepaid from the mailbox located at 20 S. Clark Street, Chicago, IL 60603 on August 27, 2018.

/s/ Angelica Harb
Attorney for Debtor

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CashNetUSA

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Suite 1000

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Northwestern Memorial Hospital

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CHICAGO IL 60601-6241

(p)PORTFOLIO RECOVERY ASSOCIATES LLC

PO BOX 41067

NORFOLK VA 23541-1067

Planet Fitness

240 E Illinois

Chicago, IL 60611-5063

Premier Bankcard, LLC

Jefferson Capital Systems LLC; Assignee

PO Box 7999

Saint Cloud MN 56302-7999

Providence Hospital

PO Box 418822

Boston, MA 02241-8822

Smile Dentist

1350 W. Belmont

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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4) .

AMERICOLLECT INC
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OPPITY FIN
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FOR THE NORTHERN DISTRICT OF ILLINOIS
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MOTION TO MODIFY PLAN

NOW COMES the Debtor, Catherine Harris, by and through Debtor's attorneys, The Semrad Law Firm, LLC hereby move this Honorable Court to Modify the confirmed Chapter 13 Plan, Debtor states the following:

1. On March 16, 2017, Debtor filed a petition for relief pursuant to Chapter 13 Title 11 U.S.C.
2. On June 20, 2017, this Honorable Court confirmed the Debtor's Chapter 13 Plan.
3. The Chapter 13 Plan allows for secured creditors to be paid 100% of their allowed claims, and general unsecured creditors without priority to be paid 10% of their allowed claims.
4. The Chapter 13 Plan requires the Debtor to make plan payments to the Chapter 13 Trustee in the amount of \$400.00 monthly for 36 months.
5. Debtor received \$3,963.00 upon filing the federal 2017 taxes.
6. In mid-December 2017, Debtor was injured at work. Debtor received treatment through March 2018.
7. Debtor used her refund to make up for the unpaid time off work to keep up with her regular ongoing household expenses.
8. Debtor respectfully requests this Honorable Court to waive the 2017 tax refunds in the amount of \$3,963.00.

9. Debtor is in a position to proceed with the instant case.
10. Debtor filed the instant case in good faith and intends to complete the plan of reorganization.

WHEREFORE, the Debtor prays this Honorable Court for the following relief:

- A. That this Honorable Court enter an Order waiving the 2017 tax refunds in the amount of \$3,963.00; and
- B. For such other and further relief as the Court deems fair and proper.

Respectfully submitted,

/s/ Angelica Harb
Attorney for Debtor

The Semrad Law Firm, LLC
20 S. Clark Street, 28th Floor
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312-913-0625